

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

In re:  THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,  as representative of  THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,  Debtors.	PROMESA Title III  No. 17 BK 3283-LTS  (Jointly Administered)
In re:  THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,  as representative of  THE COMMONWEALTH OF PUERTO RICO  Debtor.	PROMESA Title III  No. 17 BK 3283-LTS

**REPLY TO OBJECTION TO MOTION TO COMEL COMPLIANCE**

COMES NOW creditor José Miguel Malvet Santiago, through the undersigned legal counsel, and respectfully sets forth and prays:

1. On 28 October 2021, Movant filed a motion at **Docket No. 1888o** requesting that the Honorable Court enter an order compelling Debtor to comply with its very own proposed stipulation for modifying the stay so that Movant's administrative case – Case No. 2007-07-0025 before the Commission for Appeals of Public Service – can continue to its conclusion.

2. On 12 November 2021, Debtor filed at **Docket No. 19174** an objection to Movant's motion. In essence, Debtor averred that Movant incurred in an unreasonable delay in making its request and that the stipulation is not enforceable.

3. When submitting its proposed stipulation to Movant, Debtor stated that "the best course of action in the case of José Malvet Santiago... [was] to consent to modification of the stay solely to the limited extent necessary to allow the Petition to proceed to final judgment before the administrative forum". See Exhibit 1.

4. By its own admission, it is in Debtor's own best interest to fulfill its proposal for modifying the stay as to Movant's administrative case.

5. Conditions for Debtor and for Movant have not changed since stipulation talks were had between them.

6. Movant seeks no more and no less than what was proposed by Debtor.

7. Allowing Movant's administrative case to continue to final judgment will also settle the *Contingent* status under which Debtor has classified Movant's claim.

8. Given the limitation on the proposed modification of the stay, compelling enforcement of its terms will not result in any prejudice to Debtor.

**WHEREFORE**, Movant respectfully requests from the Honorable Court that it take notice of the foregoing and deny Debtor's objection to Movant's motion to compel.

#### **CERTIFICATE OF SERVICE**

I hereby certify that, on 19 November 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record and parties in the Master Service List.

The foregoing is also being e-mailed separately to all parties in interest and/or their respective counsel.

**Miguel Ángel Serrano Urdaz, Esq.**  
USDC 223608  
P.O. Box 1915  
Guayama PR 00785  
Tel/Fax 787-864-5454  
[Serrano.urdaz.law@hotmail.com](mailto:Serrano.urdaz.law@hotmail.com)

*Attorney for Movant*